

UNITED STATES BANKRUPTCY COURT
WESTERN DISTRICT OF WISCONSIN

ANNIE M. TAYLOR

Case No. 21-11295

Debtor.

**SETTLEMENT BY AND AMONG TRUSTEE PARRISH JONES, DEBTOR
ANNIE M. TAYLOR, AND CRYSTAL TAYLOR REGARDING
6684 SOUTH COUNTY ROAD F, LAKE NEBAGAMON, WISCONSIN**

NOW COMES Trustee Parrish Jones ("Trustee"), Debtor Annie M. Taylor ("Debtor"), and Crystal Taylor, who state to the Court as follows:

Recitals

- A. Debtor commenced the Chapter 7 case by filing a petition for relief on June 16, 2021 (Doc. 1). She listed among her assets in Schedule A/B a homestead located at 6684 South County Road F, Lake Nebagamon, Wisconsin (the "Homestead").
- B. Parrish Jones was appointed to serve as the Chapter 7 trustee for this matter (Doc. 5) and continues to serve in that capacity.
- C. Trustee filed an Objection to Debtor's Claim of Exemption Re: Homestead (Doc. 13). On September 8, 2021, the Court entered an Order Granting Trustee's Objection to Debtor's Claim of Exemption Re: Homestead (Doc. 25).
- D. Trustee believes the Homestead has non-exempt value that can benefit the bankruptcy estate and desires to sell and liquidate the Homestead.
- E. Debtor does not want Trustee to sell and liquidate the Homestead and has offered to pay Trustee \$45,000 in exchange for not selling and liquidating the Homestead. The source of the \$45,000 will be provided by Debtor's

daughter, Crystal Taylor. Crystal Taylor has agreed to provide the funds necessary to induce Trustee not to sell Debtor's Homestead.

NOW THEREFORE, THE PARTIES AGREE AS FOLLOWS:

1. Settlement. Trustee agrees to accept \$45,000 in good funds on or before March 22, 2022 in exchange for the Homestead's non-exempt value.
2. Crystal Taylor commits to providing and is irrevocably obligated to provide \$45,000 for this Settlement.
3. In consideration of Crystal Taylor's commitment to provide the Settlement amount of \$45,000, Trustee has been induced not to sell and liquidate the Homestead and otherwise exercise his legal rights therein.
4. This Settlement is subject to and contingent upon Bankruptcy Court approval. Trustee will file a Motion seeking approval of this Settlement.
5. The parties agree that this Settlement may be signed by electronic signatures or signatures that are scanned in an e-mail, and that such signatures shall be accepted as original and binding signatures.

WHEREFORE, the parties ask the Court for an Order as follows:

- A. Approving the Stipulation; and
- B. For such other and further relief as the Court in its discretion deems equitable and just under the circumstances.

/s/ *Parrish Jones*

Dated January 3, 2022

Parrish Jones, Chapter 7 Trustee

Dated January 3, 2022

Annie M. Taylor
Annie M. Taylor, Debtor

Dated January 3, 2022

Crystal Taylor
Crystal Taylor